

Exhibit 14

HB

From: Bedard, Hannah L. HBedard@gibsondunn.com 
Subject: RE: Headwater v. Verizon (23-cv-352) - Amended Initial Disclosures
Date: February 6, 2025 at 12:43 PM
To: Robb, Andrew ARobb@gibsondunn.com, Kristopher Davis kdavis@raklaw.com, Zhu, Michelle J. MZhu@gibsondunn.com
Cc: rak_headwater@raklaw.com, *** GDCVerizon-Headwater GDCVerizon-Headwater@gibsondunn.com, HLVerizon Headwater HLVerizonHeadwater@hoganlovells.com

Counsel,

Please let us know whether February 25 works for Headwater for Mr. Rice's deposition. We are also awaiting your response about Mr. Giancarlo's availability; please let us know once you have it.

We are aware Mr. Russell's counsel has offered 2/25, 2/26, 3/12, and 3/26 as possible dates for his deposition, and we are looking into those dates. We are also working on securing dates for Mr. Harris and Mr. Raissinia. Mr. Raissinia's counsel let us know he has been sick but hopes to be available towards the end of next week. We will update you on each as soon as we know.

In light of these pending depositions, we're attaching for your review joint motions to take certain depositions out of time, for filing with the court by tomorrow in both the Verizon and T-Mobile cases. Please let us know if you have any edits or if we have your permission to add your signature block and signature.

Thanks,
Hannah

Hannah L. Bedard
Associate Attorney

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From: Robb, Andrew <ARobb@gibsondunn.com>
Sent: Thursday, January 30, 2025 5:00 PM
To: Kristopher Davis <kdavis@raklaw.com>; Zhu, Michelle J. <MZhu@gibsondunn.com>
Cc: rak_headwater@raklaw.com; *** GDCVerizon-Headwater <GDCVerizon-Headwater@gibsondunn.com>; HLVerizon Headwater <HLVerizonHeadwater@hoganlovells.com>
Subject: RE: Headwater v. Verizon (23-cv-352) - Amended Initial Disclosures

Counsel – Mr. Rice is available for deposition on February 25th.

Please confirm that date works for Headwater.

Best regards,
Andrew

Andrew Robb

~~ANDREW ROBB~~

Partner

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310 University Avenue, Palo Alto, CA 94301-1744

From: Kristopher Davis <kdavis@raklaw.com>

Sent: Friday, January 24, 2025 5:08 PM

To: Zhu, Michelle J. <MZhu@gibsondunn.com>

Cc: rak_headwater@raklaw.com; *** GDCVerizon-Headwater <GDCVerizon-Headwater@gibsondunn.com>; HLVerizon Headwater

<HLVerizonHeadwater@hoganlovels.com>

Subject: Re: Headwater v. Verizon (23-cv-352) - Amended Initial Disclosures

Michelle,

When is Mr. Rice available for deposition?

Regards,

Kris

Kristopher Davis

Russ August & Kabat

12424 Wilshire Boulevard, 12th Floor

Los Angeles, CA 90025

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On Jan 24, 2025, at 5:06 PM, Zhu, Michelle J.

<MZhu@gibsondunn.com> wrote:

Counsel –

At the deposition of Kartik Umamaheswaran, Headwater requested that Verizon provide an additional witness on issues relating to Verizon's network capacity. Setting aside that none of the 30(b)(6) topics call for a witness on network capacity, and that Mr. Kondratiuk previously testified on certain capacity-related issues, Verizon notes that Mr. Rice, who is being disclosed herein, is knowledgeable about various capacity-related topics as well.

Best regards,
Michelle

Michelle J. Zhu
Associate Attorney

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<2025-01-24 Verizon's Fourth Amended Initial Disclosures.pdf>

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Headwater - TMO - Joint Motion
for Leave for Out of Time...



Headwater - Verizon_ Joint
Motion to Take Depos Out of...

